REMARKS

Claims 1-35 were previously pending in this patent application. Claims 1-35 stand rejected. Herein, Claims 1, 10, 19, and 28 have been amended. Accordingly, after this Amendment and Response, Claims 1-35 remain pending in this patent application. Further examination and reconsideration in view of the arguments set forth below is respectfully requested.

35 U.S.C. Section 102(e) Rejections

Claims 1-35 stand rejected under 35 U.S.C. 102(e) as being anticipated by Vaithilingam et al., U.S. Patent No. 6,411,724 (hereafter Vait). These rejections are respectfully traversed.

Independent Claim 1 recites:

> A method of forming a semantic description for content data, comprising the steps of:
> a) retrieving one or more of a plurality of component semantic descriptions stored remotely from said content data according to reference information associated with said content data; and
> b) generating said semantic description for said content data using said one or more component semantic descriptions and said reference information associated with said content data, wherein ***said semantic description describes an underlying meaning of said content data rather than what is in said content data***, and wherein ***said reference information includes one of location of said component semantic descriptions, identity of said component semantic descriptions needed to create said semantic description, and manner of processing said component semantic descriptions to create said semantic description***. (emphasis added)

It is respectfully asserted that Vait does not disclose the present invention as recited in Independent Claim 1. In particular, it is stated in the Office Action (at pages 4-5) that Vait uses and generates metadata for content data and that metadata is the "reference" data of other data wherein the reference data partially describes the content data. Further, it is stated in the Office Action (at page 3) that Vait discloses retrieving component semantic descriptions and generating a semantic description for the content data using some component semantic descriptions and reference information.

First, there are many types of metadata, which is data about other data. Assuming the data is content data, a first type of metadata describes what is in the content data. Color, shape, texture, motion, pitch, and rhythm are examples of the first type of metadata. A second type of metadata describes the underlying meaning or understanding of the content data. A soccer goal, an advertisement, Madonna, and storyline for a movie are examples of the second type of metadata. This second type of metadata is referred to as semantic descriptions. Semantic descriptions are generally expressed with words.

While Independent Claim 1 is directed to semantic descriptions, Vait is directed to the first type of metadata, which describes what is in the content data. For instance, Vait describes descriptors extracted from still images as including color, shape, texture, and sketch. [Vait; Col. 5, lines 7-8]. These descriptors

describe what is in the content data rather than the underlying meaning or understanding of the content data. Further, Vait is directed to generating meta-descriptors. [Vait; Col. 3, lines 58-62]. A meta-descriptor for an item of multimedia information identifies those parts of a descriptor for that item of multimedia information that contain the most useful information for identifying that item of multimedia information. Id. The meta-descriptor may take whatever form is convenient for the programmer. [Vait; Col. 6, lines 46-52]. In one particularly compact form, the meta-descriptor is a binary vector X, each bit x_i indicating the relevance (x_i = i^{th} feature is relevant) of a feature given a fixed number of ordered features for that category of multimedia content. Id.

Although the Office Action characterizes the "reference" data/information as metadata wherein the reference data partially describes the content data, the Independent Claim 1 clearly distinguishes the "reference information" from metadata (e.g., semantic description). Rather than partially describing the content data, the reference information of Independent Claim 1 includes one of location of the component semantic descriptions, identity of the component semantic descriptions needed to create the semantic description, and manner of processing the component semantic descriptions to create the semantic description.

Continuing, the citation Col. 2, lines 50-64, fails to disclose "retrieving one or more of a plurality of component semantic descriptions" since the citation refers to descriptors and meta-descriptors which describe what is in the content data instead of referring to semantic descriptions which describe the underlying meaning or understanding of the content data. Further, the citations (Fig. 2, item 120 and 132; Fig. 2, block 133 and 134) fail to disclose "generating the semantic description ... wherein the semantic description describes an underlying meaning of the content data rather that what is in the content data" since Vait is directed to metadata that describes what is in the content data.

Unlike Vait, Independent Claim 1 is directed to a method of forming a semantic description for content data. The method includes retrieving one or more of a plurality of component semantic descriptions stored remotely from the content data according to reference information associated with the content data. Further, the method includes generating the semantic description for the content data using the one or more component semantic descriptions and the reference information associated with the content data, wherein the semantic description describes an underlying meaning of the content data rather than what is in the content data. Also, the reference information includes one of location of the component semantic descriptions, identity of the component semantic descriptions needed to create the semantic description, and manner of processing the component semantic descriptions to create the semantic

description. Vait does not disclose the claim limitations of Claim 1, as discussed above. Therefore, it is respectfully submitted that Independent Claim 1 is not anticipated by Vait and is in condition for allowance.

Dependent Claims 2-9 are dependent on allowable Independent Claim 1, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 2-9 are patentable over Vait for the reasons discussed above.

With respect to Independent Claim 10, it is respectfully submitted that Independent Claim 10 recites similar limitations as in Independent Claim 1. In particular, the computer-executable instructions stored in the memory device of the computer system of Independent Claim 10 perform a method that includes generating a semantic description for content data using one or more component semantic descriptions and the reference information associated with the content data, wherein the semantic description describes an underlying meaning of the content data rather than what is in the content data. Also, the reference information includes one of location of the component semantic descriptions, identity of the component semantic descriptions needed to create the semantic description, and manner of processing the component semantic descriptions to create the semantic description. Therefore, Independent Claim 10 is allowable over Vait for reasons discussed in connection with Independent Claim 1.

Dependent Claims 11-18 are dependent on allowable Independent Claim 10, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 11-18 are patentable over Vait for the reasons discussed above.

With respect to Independent Claim 19, it is respectfully submitted that Independent Claim 19 recites similar limitations as in Independent Claim 1. In particular, the semantic description for content data of Independent Claim 19 is formed using one or more component semantic descriptions and the reference information associated with the content data, wherein the semantic description describes an underlying meaning of the content data rather than what is in the content data. Also, the reference information includes one of location of the component semantic descriptions, identity of the component semantic descriptions needed to create the semantic description, and manner of processing the component semantic descriptions to create the semantic description. Therefore, Independent Claim 19 is allowable over Vait for reasons discussed in connection with Independent Claim 1.

Dependent Claims 20-27 are dependent on allowable Independent Claim 19, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 20-27 are patentable over Vait for the reasons discussed above.

With respect to Independent Claim 28, it is respectfully submitted that Independent Claim 28 recites similar limitations as in Independent Claim 1. In particular, the method of Independent Claim 28 includes generating a semantic description for content data using one or more component semantic descriptions, wherein the semantic description describes an underlying meaning of the content data rather than what is in the content data. Therefore, Independent Claim 28 is allowable over Vait for reasons discussed in connection with Independent Claim 1.

Dependent Claims 29-35 are dependent on allowable Independent Claim 28, which is allowable over Vait. Hence, it is respectfully submitted that Dependent Claims 29-35 are patentable over Vait for the reasons discussed above.

CONCLUSION

It is respectfully submitted that the above amendments, arguments and remarks overcome all rejections and objections. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 1-35) are now in condition for allowance.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,

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